

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,  
OPENAI OPCO LLC, OPENAI GLOBAL LLC,  
OAI CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

Civil Action No.  
1:23-cv-11195 (SHS) (OTW)

DAILY NEWS, LP; THE CHICAGO TRIBUNE  
COMPANY, LLC; ORLANDO SENTINEL  
COMMUNICATIONS COMPANY, LLC; SUN-  
SENTINEL COMPANY, LLC; SAN JOSE  
MERCURY-NEWS, LLC; DP MEDIA NETWORK,  
LLC; ORB PUBLISHING, LLC; AND  
NORTHWEST PUBLICATIONS, LLC,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,  
OPENAI OPCO LLC, OPENAI GLOBAL LLC,  
OAI CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

Civil Action No.  
1:24-cv-03285 (SHS) (OTW)

**PLAINTIFFS' MOTION TO SEAL**

Under paragraph 22 of the Stipulated Protective Order in this case (New York Times Dkt. [127](#)), Plaintiffs The New York Times Company (“The Times”) and Daily News, LP, et al. (“Daily News Plaintiffs”) (collectively the “News Plaintiffs”), respectfully seek to provisionally file under seal an exhibit to their letter motion to compel. *See* Dkts. [379-15](#) (*The Times* docket) and [236-15](#) (*Daily News* docket) (sealed version). Public redacted versions of the exhibit have been filed as Dkts. [427](#) (*The Times* docket) and [264](#) (*Daily News* docket). The letter motion seeks a conference to discuss a discovery dispute—specifically, News Plaintiffs’ request to compel OpenAI to preserve output log data. The News Plaintiffs seek to file an exhibit to the motion under seal because the exhibit references a technical codename that Defendants have designated as Protected Discovery Material under the Protective Order. Dkt. 127 ¶ 22. The News Plaintiffs does not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. *Id.* The News Plaintiffs will review Defendants’ filings, and if necessary, confer about any disagreement.

Dated: January 17, 2025

/s/ Ian Crosby

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